

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET
(pursuant to NAC 445A.236)

Permittee Name: Accupart International, Inc.

Permittee Location: 11 Black Rock Road
Mound House, Lyon County
Carson City, Nevada 89706
Latitude: 39° 13'04" N.; Longitude: 119° 40'28" W.
SW ¼ SW¼ Section 30, T.16N., R.21E., M.D.B.&M.

Permit Number: NEV91051

General: The Permittee proposes to renew the existing Zero-Discharge Permit (Number NEV91051), which authorizes the discharge of process water containing low concentrations of metals, total petroleum hydrocarbons, and some volatile organic compounds into an evaporation pond system. Process effluent is directed from the manufacturing facility through a 1000-gallon oil/water/sand separator (OWS), where the gross organic content of the process effluent is collected, prior to aqueous discharge into an adjacent evaporative pond. The pond is constructed with a high-density polyethylene (HDPE) liner overlying a secondary, low-permeability, clay liner, which is configured to direct collected fluid into a monitoring sump for secondary leak detection.

The pond is designed with a holding capacity of approximately 0.4 acre-feet (131,768 gallons) to accommodate process water, fire sprinkler volumes, and precipitation. The depth of liquid in the pond has been reported to fluctuate typically between 1 to 2 feet during the past 5 years (1995 through 1999/2000). At least 3 inches of water have been maintained in the pond at all times, except for maintenance or repairs, to prevent potential air quality hazards and total exposure of the pond liner. Process sludge, collected in the 1000-gallon oil/water/sand separator, has been removed on a periodic basis at intervals of approximately 9 to 14 months (depending on oil thickness in the OWS) for off-site disposal as a non-hazardous waste.

Receiving Water Characteristics: Groundwater in the vicinity of the evaporation pond is potable; however, the pond is designed for Zero Discharge. Although there has been no discharge or groundwater monitoring associated with this permit, depth to groundwater has been reported at approximately 68 feet below grade surface (bgs), depending on ephemeral variations. Considering the intended Zero Discharge design of the subject system, adverse effects to groundwater are not anticipated.

Description of the Location of the Discharge: Process discharge is directed through an oil/water/sand separator prior to collection and containment within the evaporation pond. A system of 3-inch stainless/glass conveyance piping extends from the parts washer/lapping unit and tumblers (4) into the oil/water/sand separator, which then discharges through a 4-inch conduit into the northern wall of the pond (at a depth which is often below the static water level in the pond { $\approx 1.5'$ depth}). The floor drains (≈ 16 throughout the facility) converge into a 12-inch conveyance conduit that also discharges directly into the pond on the north side.

Characteristics: Process water apparently contains residual concentrations of total petroleum hydrocarbons (TPH), some heavy metals, and solvents such as benzene, toluene, methyl ethyl ketone (MEK), methyl isobutyl ketone, total xylenes, tetrachloroethene (PCE), dichloromethane (DCA), 1,4-dichlorobenzene, and trichloroethene (TCE). Analytical data on file from the initial permit application process indicated negligible concentrations of analyte compounds, with a majority of the concentrated oily/sludge material accumulated in the oil/water/sand separator, which is periodically (\approx annually) pumped for off-site disposal. Ongoing monitoring or analysis of discharge effluent has not been a permit condition in the past, until or unless an unauthorized release of ≥ 25 gallons of fluid occurs in the leak detection sump.

Flow: The Permittee has established the maximum system flow rate to be 200 gallons per day (gpd), which corresponds to twice the maximum process equipment flow rate based on manufacturer's specifications.

Historic data indicates a "used", maximum, process flow rate of 60 gpd, which was calculated based on equipment specifications. The facility currently uses one parts washer/lapper and one tumbler, producing an average daily discharge of 40 gpd, and a flow range of 20 to 60 gpd.

Permit conditions extend the maximum 30-day average flow to 140 gpd, and the daily maximum to 200 gpd. The permit also incorporates a secondary control instrument by requiring notification when system operation reaches 85% of the intended design capacity. Therefore, in the event that the facility increases production and brings on additional process equipment that have not necessarily been used during the past five (5) years, adequate flow restrictions exist in the present permit language.

Limitations: Outfall 001:

- ▶ Flow
 - 200 gpd maximum (per system design specifications at twice the maximum system process flow)
 - 140 gpd 30-day average
- ▶ Lined plant evaporation pond: weekly visual liner inspection
- ▶ Leak Detection & Recovery System: weekly collection sump inspection
 - If liquid is observed in the sump, the frequency of sump inspections will increase to daily, and each day the volume of liquid in the sump will be purged and collected. The volume of liquid collected on a daily basis will be used to estimate the daily flow of liquid into the secondary leak detection mechanism;
 - The volume of any liquid collected from the sump will be cumulatively totaled (in 5-gallon increments or using any other volumetric mechanism available to the Permittee) and recorded in daily inspection documentation prior to pumping or discharging the collected liquid back into the pond; and
 - If liquid is detected in the leak detection sump, and the flow exceeds 25 gpd, the collected liquid will be analyzed for (1) Total Petroleum Hydrocarbons (TPH), and (2) metals including: arsenic, barium, cadmium, lead, mercury, selenium, silver and volatile organic compounds including: benzene, toluene, methyl ethyl ketone (MEK), methyl isobutyl ketone, xylenes (total isomers), tetrachloroethene, dichloromethane, 1,4-dichlorobenzene, and trichloroethene using the Toxic Characteristic Leaching Procedure (TCLP) 7-11.

Procedures for Public Comment: The Notice of the Division's intent to reissue a permit authorizing the facility to discharge to the groundwater of the State of Nevada subject to the conditions contained within the permit, is being sent to the *Reno Gazette Journal* for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person, or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238. The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to re-issue the proposed permit for a period of 5 years.